

DOCKET FILE COPY ORIGINAL

RECEIVED
JUN 01 1993
FCC MAIL ROOM

BEFORE THE
FEDERAL COMMUNICATIONS COMMISSION
WASHINGTON, DC

RECEIVED

JUN 2 1993
FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

In The Matter of)
REPLACEMENT OF PART 90 BY PART)
88 TO REVISE THE PRIVATE LAND)
MOBILE RADIO SERVICES & MODIFY)
THE POLICIES GOVERNING THEM)

PR DOCKET NO. 92-235

COMMENTS OF
THE FLORIDA FORESTRY ASSOCIATION

These comments are submitted in response to the Commission's Proposed Rule Making in the above captioned proceedings.

I. INTRODUCTION

The Florida Forestry Association is the trade organization representing the forest products industry in this State. Our member companies are uniformly opposed to the proposed FCC ruling, Part 90 which would replace Part 88.

Many of our companies currently have large amounts of capital invested in radio systems which are absolutely essential for communication between employees. Most of these individuals routinely work by themselves in remote areas and therefore depend on reliable radio contact in the event of accidents, wildlife or other emergency situations. It is our belief that the FCC proposed rule making will seriously degrade existing communication systems of the forest products companies and interfere with their effort to protect and safeguard employees.

II. COMMENTS

We believe the individual private radio services, and especially the Forest Products Radio Service, has operated in the best interests of the US economy and the FCC.

No. of Copies rec'd
List A B C D E

074

Privately owned and operated shared systems are more flexible and efficient than public communication-SMR type systems. Channel loading on SMR's are in the neighborhood of 70 units per channel, typically there are often 150-250 mobile units on each private radio service frequency through careful frequency coordination. To say they are "inefficient" flies in the face of reality. Private radio service systems are more efficient and flexible, therefore, they should be retained. Especially the Forest Products Radio Service.

We are totally opposed to the HAAT/power limits proposed in this preceding. The tradeoffs are too expensive, requiring the purchase of up to six additional base or repeater stations to replace coverage of an existing station. In many, many situations in Northern California, the Pacific Northwest, Northeast and Atlantic states there are not sites to accommodate the additional stations required. We support the LMCC's proposal for power/elevation limits.

Exclusive Use Overlay (EUO's) could also be highly detrimental as proposed. Much more flexibility is needed to make EUO's of benefit. We support the FIT. MRFAC.

- 10 years after the effective date of the Rules, no protection would be offered to existing wide band systems but licensees operating wide band systems be grandfathered until such time they are required to change due to interference to narrow band systems.

Respectfully submitted by:

A handwritten signature in cursive script, reading "Wm. Carroll Lamb", written over a horizontal line.

Wm. Carroll Lamb, CAE
Florida Forestry Association
Post Office Box 1696
Tallahassee, FL 32302-1696